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15 STEPHEN GOULD CORPORATION

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 REFLEX PACKAGING, INC.,  
19 Plaintiff,

20 v.

21 STEPHEN GOULD CORPORATION,  
22 Defendant.

23 STEPHEN GOULD CORPORATION,  
24 Counterclaimant,

25 v.

26 REFLEX PACKAGING, INC.,  
27 Counter-Defendant.  
28

Case No. 5:10-cv-2909 (LHK)

**STIPULATION REQUESTING ORDER  
SHORTENING TIME TO RESOLVE  
DISPUTE REGARDING CONTENTS OF  
PROTECTIVE ORDER**

**(Local Rule 6-2)**

**[Complaint Filed: July 1, 2010]**

The Parties to this action request that the Court enter an order shortening the time for a hearing on a motion to resolve their dispute regarding the content of a protective order regarding discovery to be entered in this matter. The Parties request that the matter be heard as part of the Court's normal civil law and motion calendar at 10:00 a.m. on February 8, 2011.

On January 12, 2011, Judge Koh entered a Minute Order and Case Management Order. In that Order, the Court instructed the parties to submit a stipulated protective order by January 26, 2011. The parties have negotiated in good faith, and have been able to resolve most, although not all, issues regarding the protective order. On January 26, the Parties notified Judge Koh (a) that they had not reached an agreement on all items of the protective order, and (b) that the parties would submit their remaining disputes to Magistrate Judge Grewal, who has been assigned to handle discovery regarding the case.

As set forth in the accompanying declaration of Michael M. Carlson, the parties seek expedited resolution of their dispute, because Judge Koh has referred the case to an early settlement conference before Magistrate Judge Chen. That settlement conference is set to take place on March 1, 2011. Settlement Conference Statements are to be lodged with Judge Chen no later than February 15. The protective order is necessary to facilitate the exchange of information in advance of the settlement conference and the submission of Settlement Conference Statements. The parties believe that the remaining issues are discrete and that extensive briefing is unnecessary to adequately present their positions to the Court for resolution.

As a result, the Parties joint request that the Court enter an order adopting the following schedule:

January 28, 2011	Plaintiff's Brief in Support of Motion to Resolve Issues Regarding
	Content of Protective Order

February 1, 2011	Defendant's Opposition Brief
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1 No reply brief will be filed.

2 February 8, 2011 Hearing on Motion

3 Respectfully submitted,

4 Dated: January 28, 2011

SCHNADER HARRISON SEGAL & LEWIS LLP

5 By: /s/ Michael M. Carlson

6 Michael M. Carlson  
7 Attorneys for Plaintiff  
8 Reflex Packaging, Inc.

9 Dated: January 28, 2011

DRINKER BIDDLE & REATH LLP

10 By: /s/ Gregory J. Lavorgna

11 Gregory J. Lavorgna  
12 Attorneys for Defendant  
13 Stephen Gould Corporation

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Date: January 30, 2011

Paul S. Grewal

16 Hon. Paul Singh Grewal  
17 UNITED STATES MAGISTRATE JUDGE  
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